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Via ECF

June 14, 2022

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

*Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570
(GBD) (SN); Estate of John Patrick O'Neill, Sr., et al., v. The
Republic of Iraq, et al., 04-CV-1076 (GBD) (SN) – Disregard or
Strike Motion*

Dear Judge Netburn:

I represent plaintiffs in the above-referenced matters. I write to request that the Court strike or otherwise disregard the Motion to Add Additional Plaintiffs Against the Taliban (the “Motion”), filed today by undersigned counsel. ECF Nos. 8099 – 8102. As we were completing filing the Motion, we received hard copy engagement letters from four claimants that were signed June 1, 2022, that just arrived at our office. We intend to re-file the Motion immediately with these four claims added.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.

Attorney for the Plaintiffs

cc: The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA